

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**MDL NO. 3076**

**CASE NO. 1:23-MD-03076-KMM**

**IN RE:**

**FTX Cryptocurrency Exchange Collapse Litigation**

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THIS DOCUMENT RELATES TO:

**ALL ACTIONS**

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**JOINT NOTICE OF PROPOSED SETTLEMENT  
WITH DEFENDANT UDONIS HASLEM**

Plaintiffs and Defendant Udonis Haslem (collectively, the “Parties”) inform the Court they have reached a proposed resolution of the above-captioned class action. The Parties are in the process of preparing and finalizing the Settlement Agreement (“Agreement”). Plaintiffs will be filing a motion seeking preliminary approval of the settlement upon the Parties’ execution of the Agreement, which the parties expect will be on or before the January 13, 2025 deadline the Court set to move for preliminary approval of Plaintiffs’ proposed settlement with Defendant Prager Metis CPAs, LLC, *see* [ECF No. 1001]. While the Parties finalize the Agreement, the Parties respectfully request that the Court vacate all deadlines and pending motions for Udonis Haslem related to the above-captioned matter.

**Dated: November 26, 2025**

**Respectfully submitted,**

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### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the forgoing was filed on November 26, 2025, via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz  
Adam Moskowitz